

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	NO. 3-CR-15-70370
)	
V.)	STIPULATION AND (PROPOSED)
)	ORDER TO CONTINUE STATUS
)	CONFERENCE AND FOR
)	EXTENSION OF TIME UNDER
)	RULE 5.1 AND EXCLUSION OF
)	TIME UNDER THE SPEEDY
CARL M. FORCE)	TRIAL ACT
SHAUN W. BRIDGES,)	
Defendants.)	

The Defendants, Carl M. Force and Shaun W. Bridges, by and through their counsel, Ivan Bates, and Steven H. Levin and Craig S. Denney, respectively, and the United States hereby stipulate to a continuance of the status hearing date in this case to June 11, 2015, at 9:30 a.m. before the duty Magistrate. The Defendants and the United States agree that good cause exists to extend the time limits of Rule 5.1 to June 11, 2015. The parties also agree that time is appropriately excluded under 18 U.S.C. § 3161, the Speedy Trial Act between May 27, 2015 and June 11, 2015.

The parties agree that good cause exists, taking into account the public interest in the prompt disposition of criminal cases, to extend the time for the status hearing to June 11, 2015, to allow the parties time to investigate the matter further and to discuss a potential resolution of this matter. The parties also agree that an exclusion of time is appropriate under the Speedy Trial Act between May 27, 2015, and June 11, 2015, for purposes of continuity of counsel and effective preparation of counsel, in order to provide defense counsel with adequate time to review the matter conduct and investigation, and consult with the Defendants. In addition, the parties agree to exclude for this period of

time any time limits applicable under 18 U.S.C. § 3161. The parties represent that granting the continuance, in order to provide defense counsel adequate time to review the matter, conduct additional investigation, and consult with the Defendants, is necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties also agree that the ends of justice served by granting such a continuance outweigh the best interests of the public and the Defendants in a speedy trial 18 U.S.C. §(3161(h)(7)(A).

SO STIPULATED:

Dated: May 19, 2015

/s/
Kathryn Haun
William Frentzen

Assistant US Attorneys

/s/
Steven H. Levin, Esq.
Levin & Curlett LLC
201 N. Charles Street, Suite 2000
Baltimore, MD 21201
(410) 685-0078
(410) 685-2222 (fax)

Pro Hac Vice for Mr. Bridges

/s/
Craig S. Denney
California Bar No. 244692
Snell & Wilmer,
50 West Liberty Street
Reno, Nevada 89501
Tel: (775)785-5440

Local Counsel for Mr. Bridges

/s/
Ivan J. Bates
Bates & Garcia, P.C.
201 N. Charles Street
Suite 1900
Baltimore, Maryland 21201

Pro Hac Vice Counsel for Mr. Force

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	NO. 3-CR-15-70370
)	
V.)	(PROPOSED) ORDER TO
)	CONTINUE STATUS
)	CONFERENCE AND FOR
)	EXTENSION OF TIME
)	UNDER RULE 5.1 AND
)	EXCLUSION OF TIME UNDER
)	THE SPEEDY TRIAL ACT
CARL M. FORCE)	
SHAUN W. BRIDGES,)	
Defendants.)	

Based upon the representation of counsel and for good cause shown, the Court finds that good cause exists, taking into account the public interest in the prompt disposition of criminal cases, for extending time under Rule 5.1 for a status hearing to June 11, 2015. The Court further finds that good cause exists for a continuance of the status hearing date to June 11, 2015. The Court finds that failing to exclude the time between May 27, 2015, and June 11, 2015, would unreasonably deny the defendants and counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of the justice served by excluding the time between May 27, 2015, to June 11, 2015, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial.

Therefore, IT IS HERBY ORDERED that:

1. The status hearing date is extended to June 11, 2015;
 2. good cause exists to extend time for the status hearing under Rule 5.1 to June 11, 2015; and
 3. the time between May 27, 2015, and June 11, 2015, shall be excluded from computation under the Speedy Trial Act.
- 18 U.S.C. § 3161(h)(7)(B)(iv)

DATED: _____

United States District Magistrate Judge